

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

**KIM KARDASHIAN, ET AL**

PLAINTIFF(S)

V.

**THE GAP, ET AL**

DEFENDANT(S).

CASE NUMBER

**CV11- 6568 DSF (MANx)**

**ADR PROGRAM QUESTIONNAIRE**

(1) What, if any, discovery do the parties believe is essential in order to prepare adequately for a settlement conference or mediation? Please outline with specificity the type(s) of discovery and proposed completion date(s). Please outline any areas of disagreement in this regard. Your designations do not limit the discovery that you will be able to take in the event this case does not settle.

By Plaintiffs: Financial Discovery - March 2012 - Defendants have stated that they will oppose such discovery.

By Defendants: Defendants believe that the question of liability is paramount and that this issue must be explored through responses to interrogatories, requests to admit and certain documents are required, including depositions of Plaintiffs.

(2) What are the damage amounts being claimed by each plaintiff? Identify the categories of damage claimed [e.g., lost profits, medical expenses (past and future), lost wages (past and future), emotional distress, damage to reputation, etc.] and the portion of the total damages claimed attributed to each category.

By Plaintiffs: Disgorgement of profits, compensatory damages, punitive damages, fees and costs

Amount: Discovery Dependent

By Defendants: Defendants are not aware of any evidence that Plaintiffs suffered any damage.

(3) Do the parties agree to utilize a private mediator in lieu of the court's ADR Program?

Yes ☐ No ☒ Defendants presently prefer the Court's ADR Program, but may agree to a private mediator.

(4) if this case is in category civil rights - employment (442), check all boxes that describe the legal bases of plaintiff claim(s).

☐ Title VII

☐ Age Discrimination

☐ 42 U.S.C. section 1983

☐ California Fair Employment and Housing Act

☐ Americans with Disabilities Act of 1990

☐ Rehabilitation Act

☐ Other \_\_\_\_\_

I hereby certify that all parties have discussed and agree that the above-mentioned responses are true and correct.

January 16, 2012

/s/ Gary A. Hecker

Date

Attorney for Plaintiff (Signature)

Gary A. Hecker

Attorney for Plaintiff (Please print full name)

January 16, 2012

/s/ Edward H. Rosenthal

Date

Attorney for Defendant (Signature)

Edward H. Rosenthal

Attorney for Defendant (Please print full name)